REMARKS

Claim Rejections

Claims 1-2, 5-8, 11-13, and 15-16 rejected under 35 U.S.C. 102(b) as being anticipated by Fiete et al. (588112, referred to as "Fiete" herein). Claims 3-4, 9-10, and 14 are rejected under 35 U.S.C. 103(a) as being unpatentable over Fiete in view of Bolin et al. (5751844, referred to as "Bolin" herein).

Amendments to Specification

Applicant has amended the Specification as noted above to cure an obvious typographical error. No "new matter" has been added to the original disclosure by the foregoing amendments to the Specification.

Drawings

It is noted that the Examiner has accepted the drawings as originally filed with this application.

Claim Amendments

By this Amendment, Applicant has amended claims 3, 5, 9, and 14 of this application to correct various typographical errors. It is believed that the amended claims specifically set forth each element of Applicant's invention in full compliance with 35 U.S.C. § 112, and define subject matter that is patentably distinguishable over the cited prior art, taken individually or in combination.

35 USC § 102(b)

Claim 1:

Fiete (US5881182, hereinafter Fiete) teaches a method of determining a slope Δa_x and an offset Δb_x of two (or two columns of) adjacent pixels $i(x,y)$, $i(x+1,y)$, depending on an assumed linear transformation model $i(x,y) = \Delta a_x\, i(x+1,y) + \Delta b_x$ (Fiete, col. 3, line 51-col.6, line 51). Fiete fails to disclose the step of "establishing an interference model according to the differences" as recited in claim

1. The interference model, as disclosed in the instant application, relates a real signal x to a distorted signal y, in which the signals x or y represent the same pixels to be displayed rather than the adjacent pixels with linear relationships concerning the slope Δa_x and the offset Δb_x as disclosed by Fiete. In addition, the alleged statistical tests for seeing the quality of the interference model as noted by the Examiner are actually tests to "determine if the slope Δa_x is statistically different from unity and the offset Δb_x is statistically different from zero." (Fiete, col. 6, lines 42-44). The statistical methods do not form the interference model as recited in claim 1.

Fiete also fails to disclose the step of "producing the recovery model according to the interference model" as recited in claim 1. The asserted disclosure of producing the recovery model is a statistical test to ensure that the difference in the response curves estimated for detectors dx and dx+1 are statistically different (Fiete, col. 6, lines 44-51). The statistical difference guarantees an upgrade of image quality, which is irrelevant to the step of producing the recovery model, as recited in claim 1.

Claim 5:

A similar argument applies to claim 5. Fiete fails to disclose the step of "calculating the pixel data by the recovery model according to a difference of the pixel data and at least one adjacent pixel data" as recited in claim 5. The pixel data represent the same pixels to be displayed rather than the adjacent pixels with linear relationships concerning the slope Δa_x and the offset Δb_x, as disclosed by Fiete.

Claim 11:

Fiete fails to disclose the limitation as recited in claim 11 that "the recovery parameters are corresponding to the zipper." Fiete discloses a solution for the removal of streaks that are functionally different from the recovery of zipper images. Therefore, recovery parameters corresponding to the zipper are not disclosed in the cited reference.

It is axiomatic in U.S. patent law that, in order for a reference to anticipate a claimed structure, it must clearly disclose each and every feature of the claimed

structure. Applicant submits that it is abundantly clear, as discussed above, that Fiete does not disclose each and every feature of Applicant's amended claims and, therefore, could not possibly anticipate these claims under 35 U.S.C. § 102. Absent a specific showing of these features, Fiete cannot be said to anticipate any of Applicant's amended claims under 35 U.S.C. § 102.

35 U.S.C. § 103(a)

Bolin et al. is cited as teaching a neural network. Applicant does not necessarily acquiesce to this characterization and notes that, in any event, the reference fails to provide the above-noted deficiencies of the primary reference.

It follows that even if the teachings of Fiete and Bolin were combined, as suggested by the Examiner, the resultant combination does not suggest the recited method of claims 1 and 5 or the recited apparatus of claim 11.

Applicant also submits that there is not the slightest suggestion in either Fiete or Bolin that their respective teachings may be combined as suggested by the Examiner. Case law is clear that, absent any such teaching or suggestion in the prior art, such a combination cannot be made under 35 U.S.C. § 103.

Neither Fiete nor Bolin disclose, or suggest a modification of their specifically disclosed structures that would lead one having ordinary skill in the art to arrive at Applicant's claimed structure or method. Applicant hereby respectfully submits that no combination of the cited prior art renders obvious Applicant's amended claims.

Applicant further submits that claims 2-4, 6-10, and 12-16, by virtue of depending on claims 1, 5 and 11 respectively, should be allowed if claims 1, 5 and 11 are allowable.

Summary

In view of the foregoing amendments and remarks, Applicant submits that this application is now in condition for allowance and such action is respectfully requested. Should any points remain in issue, which the Examiner feels could best be resolved by either a personal or a telephone interview, it is urged that Applicant's local attorney be contacted at the exchange listed below.

Respectfully submitted,

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